

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

---

COR CLEARING, LLC, a Delaware  
limited liability company,

Plaintiff,

Vs.

CALISSIO RESOURCES GROUP,  
INC., a Nevada Corporation; ADAM  
CARTER, and individual; SIGNATURE  
STOCK TRANSFER, INC., a Texas  
corporation; and DOES 1-50,

Defendants.

Case No. **8:15-cv-317**

**DEFENDANT SIGNATURE  
STOCK TRANSFER'S  
ANSWER**

---

**NOW COMES** Defendant, Signature Stock Transfer, Inc., a Texas corporation, by and through counsel, and for its Answer to Plaintiffs Complaint, states as follows:

**NATURE OF THIS ACTION**

1. Defendant Signature Stock Transfer, Inc., (hereinafter SST) has no knowledge of any alleged scheme to defraud the marketplace or the clearing system.
- 2-4. Defendant SST denies each and every allegation.
5. Admit
6. Defendant SST denies each and every allegation.
- 7-8. Admit

**PARTIES**

9. Admit.
- 10-12. Deny.
13. Admit.

**JURISDICTION AND VENUE**

14. Admits that portion of the paragraph referring to SST, denies each and every other allegation.
15. Admits that portion of the paragraph referring to SST, denies each and every other allegation.

16. Admit.

**BACKGROUND**

17. Deny.

18-19. Admit.

20-21. Deny

22. Admit

23-29. Deny

30. Admit

31-40. Deny.

41-44. Deny.

45. Admit

46. Deny

47. SST denies each and every allegation set forth above, except those specifically admitted above.

48-52. Deny

**SECOND CLAIM FOR RELIEF**

53. SST denies each and every allegation set forth above, except those specifically admitted above.

54-60. Deny.

61. SST denies each and every allegation set forth above, except those specifically admitted above.

62-75. Deny.

**AFFIRMATIVE DEFENSES.**

**CONTRIBUTORY NEGLIGENCE**

76. Plaintiff's acts, or lack thereof, were a casual factor of its loss.

**FRAUD**

77. The fraudulent actions of defendants Calissio Resources Group, Inc. and Adam Carter were the cause of losses to Plaintiffs.

**FURTHER AFFIRMATIVE DEFENSES**

78. Defendant SST reserves the right to assets additional affirmative defenses as discovery may reveal.

**FAILURE TO STATE A CLAIM**

79. Plaintiff fails to state a claim upon which relief can be granted.

**LACK OF SUBJECT MATTER JURISDICTION**

80. The court lacks sufficient contracts that no subject matter jurisdiction exists.

**FAILURE TO JOIN A PARTY (12(B)(7))**

81. Plaintiff alleges in its pleading that Depository Trust Clearing Corporation (DTCC) had weakness that lead to Plaintiff's losses.

**WHEREFORE**, SST prays the complaint be dismissed at plaintiff's cost, SST the awarded its costs, attorney fees and for such other relief as the court may deem just and equitable in this cause.

Dated this 5<sup>th</sup> day of January, 2016.

Signature Stock Transfer, Inc.  
Defendant,

By: /s/ Gail E. Boliver  
Gail E. Boliver, Esq. (#20593)  
BOLIVER LAW FIRM  
8712 West Dodge Road, Suite 400  
Omaha, NE 68114  
Telephone: 402-392-0107  
Facsimile: 402-392-1011  
Email: [boliver@boliverlaw.com](mailto:boliver@boliverlaw.com)  
**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of January, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and notification of such filing was sent by electronic mail to the following:

Michael T. Hilgers (#24483)  
[mhilgers@goberhilgers.com](mailto:mhilgers@goberhilgers.com)  
Carrie S. Dolton (#24221)  
[cdolton@goberhilgers.com](mailto:cdolton@goberhilgers.com)  
GOBER HILGERS PLLC  
14301 FNB Parkway, Suite 100  
Omaha, NE 68154  
Telephone: (402) 218-2106  
Facsimile: (877) 437-5755

and

David L. Aronoff\*  
[daronoff@winston.com](mailto:daronoff@winston.com)  
Saul R. Rostamian\*  
[srostamian@winston.com](mailto:srostamian@winston.com)  
Andrew G. Smith\*  
[agsmith@winston.com](mailto:agsmith@winston.com)  
WINSTON & STRAWN LLP  
333 S. Grand Avenue, 38th Floor  
Los Angeles, CA 90071-1543  
Telephone: (213) 615-1700  
Facsimile: (213) 615-1750

\* *admitted pro hac vice*  
*Attorneys/or Plaintiff COR Clearing, LLC*

/s/ Gail E. Boliver  
\_\_\_\_\_  
Gail E. Boliver